



**Gideon Orion Oliver**

—ATTORNEY AT LAW—

He/him/his

277 Broadway, Suite 1501  
New York, NY 10007

1825 Foster Avenue, Suite 1K  
Brooklyn, NY 11230

**Gideon@GideonLaw.com\***

**GideonLaw.com**

**Office:** (718) 783-3682

**Signal:** (646) 263-3495

**Fax:** (646) 349-2914\*

*\*Not for service*

February 21, 2025

**BY ECF**

Hon. Marcia M. Henry  
United States Magistrate Judge  
United State District Court  
Eastern District of New York

Re: Adam White v. Sholem Klein, et al., 23-cv-06924 (RER)(MMH)

Your Honor:

I am co-counsel for Plaintiff Adam White.

I write to inform the Court that Defendant Klein has issued an offer of judgment pursuant to Fed.R.Civ.P. 68 today, which Plaintiff is considering. My expectation is that the claims against Defendant Klein will be resolved consistent with the offer of judgment.

The claims against the other Defendants have been resolved by Plaintiff's acceptance of a separate Rule 68 offer. I will file that offer, and proof of acceptance, on the docket next week. Relatedly, Plaintiff and the City Defendants will be asking the Court for an extension of the time within which to file any related fee application until 60 days after judgment is entered.

In light of the above, the parties respectfully ask that the Court allow the parties to submit a letter updating the Court as to the status of this matter in approximately two weeks.

Thank you for your attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver